

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ADRIAN LOPEZ, Derivatively and on
behalf of GLOBAL DIGITAL SOLUTIONS,
INC.

Plaintiff,

v.

WILLIAM J. DELGADO, RICHARD J.
SULLIVAN, DAVID A. LOPPERT,
JEROME J. GOMOLSKI, STEPHANIE C.
SULLIVAN, ARTHUR F. NOTERMAN,
AND STEPHEN L. NORRIS,

Defendants,

and

GLOBAL DIGITAL SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-cv-03468-PGS-LHG

Hon. Peter G. Sheridan

Hon. Lois H. Goodman

NOTICE OF MOTION TO REMAND

TO: BRINEN & ASSOCIATES, LLC
Joshua D. Brinen
90 Broad Street, Second Floor
New York, NY 10004

BRUCE E. REINHART, P.A.
Bruce E. Reinhart
250 S. Australian Avenue, Suite 1400
West Palm Beach, Florida 33401

PLEASE TAKE NOTICE that, on July 17, 2017, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Plaintiff Adrian Lopez will move this Court, before the Honorable Peter G. Sheridan, United States District Judge for the District of New Jersey, Clarkson S. Fisher Building and United States Courthouse, 402 East State Street, Trenton, New Jersey, for the entry of an Order remanding this action to the Superior Court of

New Jersey, Chancery Division, Mercer County, the court from which the above-captioned action was unduly removed and requesting that the Court take no action on Defendant William J. Delgado's and David A. Loppert's motions to dismiss for lack of personal jurisdiction.

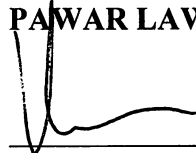
PLEASE TAKE FURTHER NOTICE that, in support of the motion, the undersigned will rely on the Memorandum of Law and Declaration of Timothy W. Brown and Exhibit A thereto, annexed hereto.

PLEASE TAKE STILL FURTHER NOTICE that a proposed Order is annexed hereto.

Dated: June 14, 2017

Respectfully submitted,

PAWAR LAW GROUP P.C.



Vik Pawar, Esq.
6 South Street, Suite 201
Morristown, New Jersey 07960
Telephone: (212) 571-0805
Facsimile: (212) 571-0938
Email: vikrantpawaresq@gmail.com

THE BROWN LAW FIRM, P.C.

Timothy W. Brown, Esq.
240 Townsend Square,
Oyster Bay, NY 11771
Telephone: (516) 922-5427
Facsimile: (516) 344-6204
Email: tbrown@thebrownlawfirm.net

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 14, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF.

/s/ Vik Pawar
Vik Pawar